

Submitted to Fast-track approval applications
Submitted on 2024-05-03 17:13:06

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Invercargill City Council

2 Contact person

Contact person name:

s 9(2)(a)

3 What is your job title

Job title:

s 9(2)(a)

4 What is your contact email address?

Email:

s 9(2)(a)

5 What is your phone number?

s 9(2)(a)

6 What is your postal address?

Postal address:

s 9(2)(a)

OR

s 9(2)(a)

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

Awarua Alternate Water Supply
Awarua Communication Museum Site
1276 Bluff Highway

The registered title is: SL9B/884

Being an estate in fee simple comprising 96.6131 ha more or less with the legal description Part Section 16 and Part Section 30A Block III Campbelltown Hundred

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Do you have a current copy of the relevant Record(s) of Title?

Yes

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Who are the registered legal land owner(s)?

Please write your answer here:

Invercargill City Council

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Invercargill City Council owns the land where the proposed borefields and Water Treatment Plant will be located.

Section 2: Project details

What is the project name?

Please write your answer here:
Alternate Water Supply Project

What is the project summary?

Please write your answer here:

Invercargill City's existing water supply is from a single , surface water source. This leaves the Region's biggest city exposed to risk of water supply compromise or failure. The Alternate Water Supply project seeks to provide capacity to supply approximately 20M l/day of treated water

What are the project details?

Please write your answer here:

Details: The Invercargill City Council provides a drinking water system that supports over 55,000 residents and numerous businesses, all relying on a singular source from the Oreti River. This singular dependency poses a high risk in the event of a source failure due to factors like drought or contamination, potentially disrupting essential services, economic activities, and fire safety across the city.

The Council seeks to establish a reliable, secondary alternate water source that will secure water supply for the future and enhance the city's resilience and economic stability. The new source is expected to supply or exceed 80% of the city's daily water demand and be complemented by a secondary treatment facility, additional storage, and pumping infrastructure.

By diversifying our water supply sources, we safeguard community well-being against emergencies, support future economic growth, and ensure a reliable and efficient water system for Invercargill and its surrounding areas.

Invercargill City Council has invested in groundwater investigations in the Awarua area. The results of the Investigation and testing of the Chatton Aquifer were used to establish a groundwater model. The model has been to test a wide range of groundwater take scenarios and model the short and long terms effects of groundwater abstraction.

Purpose: The purpose of this project is o to secure an alternate water supply and treatment system for Invercargill City to provide resilience in the Region's largest City.

Objectives: The overall objective of this project is to enhance the long-term resilience and capacity of Invercargill and Bluff's potable water supply before

2027, so that it can withstand a prolonged loss of the existing Oreti River water source. Invercargill City Council is well advanced in its supplementary water source investigations in the Awarua area. The project will:

1. Provide a safe and reliable supplementary water supply and treatment for Invercargill City.
2. Ensure that the water take and use is sustainable and adverse effect on the environment and other water users are taken into account.
3. Reflect a partnership process that meets the commitments of the Charter of Understanding He Huarahi mo Nga Uri Whakatipu.
4. Reflect the outcome of meaningful and constructive consultation with stakeholders and the community.
5. Form the basis for approvals that provide the community with certainty for this essential infrastructure service.

Activities: The activities involved include:

- Resource consents for drilling, constructing and testing groundwater bores
- Resource consent to take and use water for municipal supply
- Notice of Requirement to designate land for water supply and treatment purposes
- Resource consent to discharge wastewater from a water treatment plant
- Resource consents for land disturbance and bridging associated with installation of water supply reticulation

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

There is no staging of this project.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource consents and a designation under the Resource Management Act 1991.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Environment Southland, Invercargill City Council.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

The Council has obtained resource consents for exploration bores. The purpose of the bores was to install a production well and multi-level piezometer to support investigation of the aquifer performance. The investigations indicated the Chatton Formation (aquifer) in the Awarua area has the potential to support development of a moderate-scale water source suitable for municipal supply That information has been used to inform the ongoing investigation.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

N/A

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Invercargill City Council has \$60.5M is budgeted to 2030/2031 for this project. Budget for a two year construction period is provided for in the Draft Long Term Plan 2024 – 2038.

The investigation phase is continuing to confirm aspects of the viability of the resource for municipal supply. These investigations are scheduled for completion for the final quarter of this year.

The following timeline is planned as an accelerated delivery:

Design: duration 6 -10 months commencing Dec 2024

Procurement: 6 months commencing July 2025

Siteworks commencing: August 2027

Completion: March 2029.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Te Rūnanga o Ngāi Tahu, represented locally by Te Rūnaka o Awarua and Waihōpai Rūnaka.

No other persons have been identified as likely to be affected.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Te Rūnanga o Ngāi Tahu and Invercargill City Council are working in partnership under the Charter of Understanding (He Huarahi mō Ngā Uri Whakatupu/A Pathway for the Generations Coming Through) through its representative Te Ao Marama Incorporated (TAMI).

Te Rūnanga o Awarua, Waihōpai Rūnaka and TAMI have been advised of the project through their involvement in the Primary Infrastructure Consenting Programme Governance Group the Council runs.

Invercargill City Council's Draft Long Term Plan 2024-2034 proposes securing an alternative water supply and has been the subject of community consultation, which has been supportive.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

No works undertaken.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Ngāi Tahu Treaty Settlement applies to the location of this project, insofar as it falls Ngāi Tahu claim area in the Ngāi Tahu Claims Settlement Act 1998 (NTCSA). However, there are no specific sites mentioned in the NTCSA that this project applies to.

The project site is not within, adjacent to, or impacting on any statutory acknowledgement areas.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

N/A. There are no protected customary rights orders or agreements applicable.

Upload your assessment if necessary:

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Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Please see uploaded document addressing anticipated and known adverse effects.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

National Policy Statement for Freshwater Management 2020

The National Policy Statement for Freshwater Management (NPS-FM) sets out an objective and policies for managing freshwater. Te Mana o te Wai, which includes the hierarchy of obligations, is embedded in the NPS objective.

The NPSFM objective is to ensure that natural and physical resources are managed in a way that prioritises the health needs of water bodies and freshwater ecosystems and then the health needs of people (such as drinking water) above other uses. The project meets the second obligation in the hierarchy; it seeks to provide resilience in the water supply that provides for the health needs of the Invercargill community.

Groundwater investigation and modelling currently in progress will determine the sustainable yield of the aquifer. This will set the budget for water allocation within which Invercargill City Council will determine the daily and annual water allocation that will be sought in the resource consent application.

It is considered that the project will be consistent with the NPS-FM policies, specifically:

- Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.
- Policy 2: Tangata whenua are actively involved in freshwater management and Māori freshwater values are identified and provided for.
- Policy 4: Freshwater is managed as part of New Zealand's integrated response to climate change.
- Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.
- Policy 11: Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.

The water permit application to take water will be within the take limits set by Environment Southland or, where Environment Southland is yet to set limits, determined through the project groundwater model. It is in the best interests of Invercargill City Council to ensure that the allocation sought through the water permit application is sustainable as the adverse effects of any overuse would significantly adversely affect the Invercargill City Council's water supply and investment.

National Policy Statement on Urban Development 2020

For this project the most relevant objectives of the NPS-UD 2020 (revised May 2022) are:

- Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.
- Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

The NPS-UD policies relating to the nature of urban built form are not directly relevant, but together with the corresponding policies emphasise the importance of enabling development capacity and enabling urban environments to evolve over time. In relation to the development capacity of urban areas, clause 3.4(3) expressly refers to the concept of being "infrastructure-ready", in the short term, medium term and long term. This project is fully consistent with these policies in that it provides critical water infrastructure for the Invercargill community, now and in the future.

Other national policy statements and standards

- The National Environmental Standards for Freshwater 2020 (NES-F) may be relevant to the water permit application if the effects of the proposed water take trigger the need for consent under the standards. The likelihood of this is considered to be low.
- The National Environmental Standard for sources of human drinking water is not directly relevant to the water permit application but will become relevant for local authorities managing land use activities in the area after the water permit is granted.

- Invercargill City Council will install and read water meters as required by the Measurement and reporting of water takes regulations.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The fast-track process, when compared to the RMA, will provide for the more timely processing of resource consents and designations required for Invercargill's Alternate Water Supply Consent, therefore making the process more cost-effective for Invercargill City Council and the ratepayers of Invercargill City.

Processing under the RMA may require public or at limited notification of the application. If the resource consents and designation are notified, it can be assumed that a council level hearing will also be held. The statutory timeframe for the processing of a fully notified application, with a council level hearing, is 130 working days (which equates to approximately six months). If an Environment Court appeal is lodged, this timeframe is extended significantly, with a corresponding increase in cost and a delay in reapproving well-functioning local infrastructure. In contrast, for listed projects, the Panel must issue their comments no later than 25 working days following the receipt of submissions.

By limiting notification, and avoiding the need for an Environment Court hearing, the costs of the project are reduced. The benefits of these reduced costs are relevant to all ratepayers of the Invercargill City in consenting an alternative water supply, the delivery of which is a key priority for the community (Draft Infrastructure Strategy 2024 – 2054).

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The Alternate Water Supply Project is critical infrastructure for Invercargill City. It has consistently been identified in long term plans and strategies over the past 10 years as a key area of investment by the Council.

Engagement with stakeholders on options for Invercargill's alternative water supply has been ongoing. During engagement, the most commonly mentioned area of infrastructure is Three Waters; and the importance of prioritising an alternative water supply has been mentioned most (Long Term Plan 2021 – 2031). This theme is repeated in the Draft Long Term Plan 2024 – 2034, and has been supported by the public in its feedback. Resolution of the issue is clearly an area of concern to the community.

These factors might lead an expert panel considering the Alternate Water Supply Project under the fast track legislation, having invited comments from relevant parties (which we would expect to be relatively limited in number), to consider a hearing to be unnecessary.

It is not expected that processing the application would put a significant strain on the fast track process or in any way impede its efficient operation.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

The Draft Long Term Plan 2024 – 2034, Our Road Map, Our People with specific reference to Water Supply states:

"We are focusing on how we deliver an alternative water supply for the city. We need to undertake more testing to check the reliability of the supply in the aquifer we have found. Then there will be significant investment of an estimated \$60.5 million required to access, treat and supply the water to the city."

The current Long Term Plan 2021 – 2031 also identifies the sole source of water supply for the District as an issue; and contains as a 'significant decision' the options to address this (by developing a secondary water source; increasing water storage; or doing nothing).

Will the project deliver regionally or nationally significant infrastructure?

Regional significant infrastructure

Please explain your answer here:

The Invercargill Alternate Water Supply Project will deliver regionally significant infrastructure. Regionally or nationally significant infrastructure is not defined in the FTA Bill or the RMA, however national policy statements have defined it with reference to regional policy statements (RPS) and regional plans. The Southland RPS includes the following definitions of regionally significant infrastructure, and critical infrastructure:

Regionally significant infrastructure: infrastructure in the region which contributes to the wellbeing and health and safety of the people and communities of the region, and includes all critical infrastructure.

Critical infrastructure: infrastructure that provides services which, if interrupted, would have a significant effect on the wellbeing and health and safety of people and communities and would require reinstatement, and includes all strategic facilities.

The Alternate Water Supply Project would come within the definition of 'critical infrastructure'. Clearly, if the water supply to Invercargill City were interrupted, this would have a significant impact on the wellbeing and health of residents. If the current source of drinking water for the District (being the Oreti River and Branhholme Water Treatment Plant) were to fail, or was interrupted, over 55,000 people would be without drinking water, or water for sanitation purposes or firefighting. This represents a significant risk to the health, safety and wellbeing of these communities. An improved water supply will also provide for water for the green hydrogen and aquaculture developments planned for the south of the city.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

The Branhholme Water Treatment Plant is currently the sole reticulated water supply source for Invercargill City. It is reliant on one open source water supply (the Oreti River), which gives rise to a high risk of not having access to water for a significant period of time. Causes of an interruption to supply include the River being contaminated or becoming unusable as a result of unexpected extreme weather events (flooding and drought), coastal inundation and natural disaster (Draft Infrastructure Strategy 2024 – 2054, Infrastructure Strategy 2018 – 2048).

The National Policy Statement on Urban Development 2020 defines well-functioning urban environment with reference to enabling a variety of homes that are resilient to the likely current and future effects of climate change. By providing an alternative source of drinking water for the Invercargill District, and therefore protecting against the possibility of extreme weather events, the Alternate Water Supply Project meets this purpose.

The Council's draft Infrastructure Strategy for 2024 – 2054 also identifies the need for infrastructure upgrades, including in respect of drinking water, to service the forecast growth needs of businesses and / or residential properties in the area. In the Invercargill District, the primary driver of demand for potable water is growth in resident population. The population growth for Invercargill is around 1%. This rate has been observed historically, making it a reasonable assumption for the next 10 years at least.

A well-functioning environment is one that provides for homes that meet the needs of different households, and enable a variety of sites suitable for different business sectors. The Alternate Water Supply Project will enable the Council to provide for and manage this growth. Without it, this purpose is unable to be met.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

As discussed above, an alternative water supply is required to enable the future growth of Invercargill's residential, commercial and industrial areas. As urban and industrial parts of the city grow, they demand more water. The Alternate Water Supply Project provides security that there will be adequate water to facilitate this growth (as its additional capacity will enable economic development opportunities) and protect the community against the risk of disruption to its water supply.

Further, a secure water supply reduces the potential for economic disruption, as businesses and industries that depend on water can continue their operations during emergencies and invest for the future.

Invercargill City Council sees improved water supply as enabling the green hydrogen and aquaculture developments planned for the south of the city.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

As the project is for the municipal water supply it does not directly support primary industries (ie through the provision of stock water). However, it would support the expansion of any processing industrial or commercial activity associated with primary industries.

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

N/A

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

Yes, the project will support climate change mitigation.

The most catastrophic events requiring mitigation would be a prolonged drought, drying up the Oreti River (which is subject to a water conservation order). Flood damage and its poor water quality are also a risk. As the impacts of climate change increase, so does the likelihood of prolonged and severe drought; therefore exacerbating the risk of these events occurring.

The Alternate Water Supply Project safeguards against these risks and ensures that Invercargill City is resilient against the effects of climate change.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The Alternate Water Supply Project provides for the resilience of Invercargill City's drinking water supply against natural hazards and disasters, such as a large earthquake destroying critical assets or a chemical or biological contamination of the Oreti River.

A sustained loss or significant contamination of the Oreti River supply would have very significant adverse effects, halting economic activities, crippling the wastewater system, imperilling healthcare services and limiting firefighting capabilities.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

In the event of either a loss or contamination of the Oreti River supply, Invercargill and Bluff would be without drinking water. This would expose over 55,000 people to a severe public health and safety emergency. All non-essential and non-potable water use would also cease immediately, effectively shutting down all commercial and industrial activity in the city. No water supply would also eliminate the ability to flush wastewater, and impact healthcare and firefighting capabilities, compounding the health impacts. These public health effects are significant, and could be avoided by completing the Alternate Water Supply Project.

The project will also result in environmental benefits. Parts of the Oreti River are subject to a Water Conservation Order (the Water Conservation (Oreti River) Order 2008), in recognition of its amenity or intrinsic values. In particular, the Water Conservation Order recognises its habitat for brown trout and black billed gulls; its angling amenity and its significance in accordance with tikanga Māori.

Currently, the entirety of Invercargill District's drinking water supply is drawn from the Oreti River. By introducing an alternative source / supply, the amount drawn from the Oreti will be reduced.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

Yes, the project is consistent with the following local and regional planning documents:

Operative Southland Regional Policy Statement 2017

The objectives and policies of the following chapters are relevant to this project.

- Chapter 4 (Water)
- Chapter 15 (Part A - Infrastructure)

Particularly relevant objectives are:

- Objective WQUAN.1 – Sustainably managing the region's water resources
- Objective WQUAN.2 – The efficient allocation and use of water
- Objective INF.1 – Southland's infrastructure

This project will achieve the above objectives as:

- The project will meet the social and economic needs of the Invercargill community, including the need for a resilient water supply that sustains the community in the future, while complying with aquifer water take limits. (Obj. WQUAN.1)
- The project provides critical infrastructure that is also regionally significant in terms of the community and economic development and jobs that it enables and supports (Obj. INF.1);

There are a range of policies in the RPS relating to allocation, water demand management, abstraction management and efficient use of water. These will be fully addressed in the application to show that the project is fully consistent with them.

Partially operative Southland Regional Water and Land Plan (RWLP)

Particularly relevant region-wide objectives are:

- Objective 1 relating to sustainable and integrated management;
- Objective 3 relating to economic, social and cultural wellbeing;
- Objective 4 relating to tangata whenua values and interests;

- Objective 7 relating to avoidance of over-allocation of freshwater bodies
- Objective 8 relating to groundwater quality in relation to Drinking Water Standards and freshwater limits;
- Objective 9B relating to the importance of enabling regionally and nationally significant infrastructure;
- Objective 11 relating to the reasonable and efficient use of water abstracted;
- Objective 12 relating to groundwater quantity and flow connections to surface water bodies.

Particularly relevant region-wide policies are:

- Policy B7 of the NPS-FM (replicated in the RPS);
- Policy 20 (Management of Water resources), including clauses 1A, 1, 2 and 3
- Policy 21 (Allocation of water)
- Policy 22 (Management of the effects of groundwater and surface water use)
- Policy 24 (Water abstraction for community water supply)
- Policy 25 (Priority takes) – at times of water shortage
- Policy 26A (Infrastructure)

This project is assessed as one that will achieve the objectives of the RWLP and is consistent with the policies that implement the objectives. This project will achieve efficient abstraction of groundwater, within aquifer take limits, for essential community use, fully consistent with Objective 7 and 11. It will also achieve the operation of regionally significant infrastructure, fully consistent with Objective 9B. Environmental safeguards and conditions will also ensure that other objectives are achieved.

Policy 24 is specifically relevant. It recognises the need for, and assigns priority to, the provision of water for community water supply when allocating water, subject to clauses requiring the avoidance, remedy or mitigation of adverse effects and the provision of a water demand management strategy. The project is consistent with Policy 24, and also other applicable policies as noted above.

Invercargill City Council: Infrastructure Strategy 2024 -2054 – Draft

This strategy records the Council's commitment to working closely with the Regional Council, Great South, the Chamber of Commerce and other stakeholders to support economic diversification for the region. The Awarua Alternate Water Supply will help ensure that water supply to support economic growth is maintained.

The strategy also records an important issue in securing infrastructure for new subdivisions and industry: The Awarua Industrial Park is a location where future industry growth will be expected. Services (including water services) to this area will be required. Dependent on industry demand Council is also considering additional water capacity to Bluff over the term of the Infrastructure Strategy.

The strategy confirms that Council is planning to provide its Alternative Water Supply, and that this supply will have sufficient capability to provide improved levels of service.

Beyond 2025 Southland Regional Long Term Plan

Beyond 2025 Southland is the long-term planning workstream of Southland's Just Transition Work Plan and the updated Regional Development Strategy (SoRDS).

One of the key workstreams sets an objective to prepare for and understand how to future proof water and water assets to ensure the region can prosper. The two key outcomes for this workstream are:

Key Outcomes

1. Support the investigation of resilient potable water supplies in Southland to support our main urban centres and large-scale processing industries as well as meet the future needs of new energy opportunities such as hydrogen.
2. Modelling of a deep shale formation known as the Chatton Formation, with the aim to create a 3D model and validation with aerial assessments SkyTEM.

The Awarua Alternate Water supply project is the embodiment of these Regional objectives.

Anything else?

Please write your answer here:

Water Services Act 2021

The Water Services Act requires that water supplies, such as Invercargill City Council, provide safe drinking water that meets the standards and requirements of a drinking water supplier.

Invercargill currently relies on a single surface water supply from the Oreti River, which is subject to a Water Conservation Order. The river is vulnerable to reduced and unreliable flows as a consequence of climate change and upstream water use. It is also at risk of contamination from one of many different upstream land uses.

An alternate water supply and water treatment plant will provide redundancy in the existing system, increase resilience and improve Invercargill City Council's ability to provide the community water supply in accordance with the Water Services Act.

Schedule 2A/2B

Invercargill City Council considers this is an appropriate project for Schedule 2A but if it is not accepted for Schedule 2A, seeks that it be listed in Schedule 2B.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

No non compliances or enforcement actions taken.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Russell Keen

Important notes